

**VOC EMISSIONS TESTING  
TWO CMM CATALYTIC OXIDIZERS  
BAXTER HEALTHCARE CORP.  
MOUNTAIN HOME, ARKANSAS  
JULY 2016**

**AR DEQ Permit 0544-AR-12  
AFIN 03-00002**

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## **1.0 INTRODUCTION**

Air Pollution Characterization and Control, Ltd. (APCC) was retained by the CMM Group of DePere, Wisconsin; to perform a VOC destruction efficiency (DE) test program on two new CMM Recuperative Catalytic Oxidizers at Baxter Healthcare Corporation (Baxter) in Mountain Home, Arkansas. The oxidizers were installed in 2015 to control emissions of ethylene oxide (EtO; CAS 75-21-8). This test program was performed to satisfy the requirements of the following:

- **AR DEQ Permit 0544-AR-12; AFIN 03-00002**
- **40 CFR 63 Subpart O; *Ethylene Oxide Emissions Standards for Sterilization Facilities***

Baxter produces health care products at the Mountain Home facility. These products require sterilization using EtO upon the conclusion of manufacture and packaging. Following sterilization in sterilization chambers (not subject to this test program), these products are placed in aeration chambers to out-gas the remainder of the EtO following the final sterilizer drawdowns. CMM installed these two 25,000 cfm catalytic oxidizers to control emissions of EtO from four aeration chambers. Each oxidizer controls emissions from two aeration chambers.

Testing was performed to demonstrate compliance with the required VOC destruction efficiency of  $\geq 99\%$  or emission concentration of  $\leq 1$  ppm as EtO, as per 40 CFR 63 Subpart O, as well as the Arkansas DEQ Permit.

Sampling of the two catalytic oxidizers was performed utilizing EPA Methods 1, 2, 18 and 25A under normal plant operating conditions to determine destruction efficiency for VOC as Non-Methane Hydrocarbons (NMHC). EtO emissions from the oxidizer were determined as described below.

Total Hydrocarbon (THC) emissions were determined at the inlet of each catalytic oxidizer in accordance with EPA Method 25A. This measurement is a quantification of all volatile hydrocarbon (up to approximately  $C_{17}$ ) emissions expressed in relation to an instrument calibration as methane.

Concentrations of methane and non-methane hydrocarbons, a better measure of VOC, were determined at the catalytic oxidizer outlet only during each test by Method 18 and 25A. Typical inlet methane concentrations are ambient and  $<1\%$  of total THC (typical ambient  $CH_4$  is  $\sim 1-2$  ppm) and were not quantified.

Volumetric flow rates were measured at both sample locations during each test in accordance with EPA Methods 1 and 2. Data were utilized to determine mass emission rates and catalytic oxidizer destruction efficiency.

Testing was conducted on Monday and Tuesday, 25 and 26 July 2016. Testing was performed under the supervision of Brett T. Smith, Principal Engineer of APCC, assisted on-site by Derrek Schultz, Environmental Scientist. Darren Reschke of CMM was on-site to oversee catalytic oxidizer operations. Process and regulatory coordination was provided by Kurt Parnell, of Baxter Healthcare. No regulatory personnel were on-site during the test program.

The results of this test program are discussed in Section 2. A facility description and details of the operational conditions of the facility during testing are presented in Section 3. An in depth description of all sampling and analytical methodologies to be utilized during testing is presented in Section 4. Section 5 contains APCC's quality assurance/quality control (QA/QC) plan as implemented during the performance of the test program.

## **2.0 RESULTS & DISCUSSION**

APCC performed destruction efficiency of the recuperative catalytic oxidizers used to control EtO being emitted from the aeration chambers at Baxter Healthcare's facility in Mountain Home, Arkansas.

Testing was performed on 25 and 26 July 2016 under normal operations. Process operational data are presented in Appendix C.

Triplicate 60-minute tests were performed at the inlet and outlet of each oxidizer.

Test results for testing performed on 25 July on Oxidizer B are presented in Table 2-1.

Test results for testing performed on 26 July on Oxidizer A are presented in Table 2-2.

Measurements at both oxidizers indicate compliance with permit conditions, under the compliance scenario limiting emissions of ethylene oxide to  $\leq 1.0$  ppm. An EtO FID response factor of 1.3, with respect to methane, was utilized to determine concentrations of EtO measured as methane. Using this response factor, 1 ppm CH<sub>4</sub> equals 0.77 ppm EtO; or 1 ppm EtO will be equivalent to 1.3 ppm CH<sub>4</sub>.

Essentially all measured hydrocarbons exiting both oxidizers was quantified as methane, a non-VOC. These data indicate compliance with the alternate emission requirement of  $\leq 1$  ppm EtO.

It should be noted that EtO loading to the oxidizers was significantly less than design conditions as described in Section 3. It is likely that at higher loadings to these units, destruction efficiency would be higher as oxidizers tend to perform at a greater efficiency at higher VOC loadings.

All sampling and analyses were performed in accordance with 40 CFR 60 Appendix A Methods 1, 2, 3, 18, and 25A, as described in Section 4 of this report. All tests met the QA/QC requirements of the above methodologies.

All field sampling, analytical, calibration and process data are presented in the Appendix of this report.

**Table 2-1**

| <p align="center"><b>Summary of Measured Destruction Efficiency</b><br/> <b>Oxidizer B</b><br/> <b>Baxter Healthcare</b><br/> <b>Mountain Home, Arkansas</b><br/> <b>25-Jul-16</b></p> |           |             |                               |                                  |             |                               |                       |                                |                                   |                            |
|--|-----------|-------------|-------------------------------|----------------------------------|-------------|-------------------------------|-----------------------|--------------------------------|-----------------------------------|----------------------------|
| Test No.   | Time      | Inlet       |                               |                                  | Outlet      |                               |                       |                                |                                   | Destruction Efficiency (%) |
|  |           | Flow (scfm) | THC (ppm as CH <sub>4</sub> ) | THC (lbs/hr as CH <sub>4</sub> ) | Flow (scfm) | THC (ppm as CH <sub>4</sub> ) | CH <sub>4</sub> (ppm) | NMHC (ppm as CH <sub>4</sub> ) | NMHC (lbs/hr as CH <sub>4</sub> ) |                            |
| 1  | 1103-1203 | 24,068      | 33.9                          | 2.03                             | 23,863      | 5.9                           | 5.1                   | 0.8                            | 0.05                              | 97.5%                      |
| 2  | 1218-1318 | 23,842      | 25.1                          | 1.49                             | 24,846      | 5.6                           | 5.0                   | 0.6                            | 0.04                              | 97.6%                      |
| 3  | 1338-1438 | 23,937      | 40.4                          | 2.41                             | 27,344      | 5.8                           | 4.8                   | 1.0                            | 0.07                              | 97.1%                      |
| <b>Average</b>   |           | 23,949      | 33.1                          | 1.98                             | 25,351      | 5.8                           | 4.9                   | 0.8                            | 0.05                              | 97.4%                      |

**Table 2-2**

| <b>Summary of Measured Destruction Efficiency</b><br><b>Oxidizer A</b><br><b>Baxter Healthcare</b><br><b>Mountain Home, Arkansas</b><br><b>26-Jul-16</b> |             |                    |                                    |                                       |                    |                                    |                             |                                     |  |                                   |
|--|-------------|--------------------|------------------------------------|---------------------------------------|--------------------|------------------------------------|-----------------------------|-------------------------------------|--|-----------------------------------|
| <b>Test No.</b>  | <b>Time</b> | <b>Inlet</b>       |                                    |                                       | <b>Outlet</b>      |                                    |                             |                                     |  | <b>Destruction Efficiency (%)</b> |
|  |             | <b>Flow (scfm)</b> | <b>THC (ppm as CH<sub>4</sub>)</b> | <b>THC (lbs/hr as CH<sub>4</sub>)</b> | <b>Flow (scfm)</b> | <b>THC (ppm as CH<sub>4</sub>)</b> | <b>CH<sub>4</sub> (ppm)</b> | <b>NMHC (ppm as CH<sub>4</sub>)</b> | <b>NMHC (lbs/hr as CH<sub>4</sub>)</b> |                                   |
| 1  | 830-930     | 24,458             | 26.2                               | 1.60                                  | 25,835             | 7.8                                | 8.0                         | <0.1                                | <0.01                                  | >99.6%                            |
| 2  | 944-1044    | 24,384             | 15.1                               | 0.92                                  | 25,923             | 7.0                                | 7.5                         | <0.1                                | <0.01                                  | >99.3%                            |
| 3  | 1100-1200   | 24,760             | 15.3                               | 0.95                                  | 25,727             | 7.0                                | 7.2                         | <0.1                                | <0.01                                  | >99.3%                            |
| <b>Average</b>   |             | 24,534             | 18.9                               | 1.15                                  | 25,828             | 7.3                                | 7.5                         | <0.1                                | <0.01                                  | >99.4%                            |



### **3.0 PROCESS DESCRIPTION**

Baxter produces health care products at the Mountain Home facility. These products require sterilization using EtO upon the conclusion of manufacture and packaging. Products are placed in a sterilization chamber, which is evacuated with vacuum pumps. The chamber is then flooded with ethylene oxide.

After a predetermined time, the chamber is evacuated, removing approximately 95% of the EtO by vacuum pumps, which exhaust to a scrubber where it is converted to ethylene glycol. Following sterilization in the sterilization chambers (not subject to this test program), these products are placed in aeration chambers to out-gas the remainder of the EtO following the sterilizer drawdowns.

Each of the four aeration chambers is nominally 96,000 ft<sup>3</sup> in volume (when empty). Approximately 67,000 lbs. of product is placed in each of these chambers over a period of 24 hours, and allowed to out-gas for an additional period of 100 hours. Aeration chamber exhaust is vented to the air pollution controls described below. Chambers 401 and 402 exhaust to Oxidizer A, while Chambers 501 and 502 exhaust to Oxidizer B (see figure in Appendix). Each aeration chamber exhaust is approximately 12,000-13,000 acfm at 115°F, exhausting at maximum of 8.5 lbs/hr EtO to each oxidizer.

In 2015, CMM installed two new 25,000 cfm recuperative catalytic oxidizers to control emissions of EtO from the aeration chambers. Each oxidizer utilizes a forced draft fan to provide aeration chamber exhaust to a 2,850 kg Clariant catalyst, with a minimum catalyst inlet temperature of 350°F. Both oxidizers are fired with natural gas.

The Recuperative Catalytic oxidizer is designed to operate transparent to the production facility. Exhaust emissions from the aeration chambers are collected in a common ductwork header and directed to the recuperative catalytic oxidizer using the main recuperative catalytic oxidizer supply fan. Volumetric control through the oxidizer is automatically adjusted by using a variable frequency drive unit to control the fan speed by sensing and monitoring collection ductwork pressure. The exhaust flow volume from the process is expected to fluctuate and also to contain various levels of VOC loading.

The process exhaust air is forced into the inlet of the catalytic oxidizer and is directed through the "cold" side of the primary heat exchanger to be preheated. The preheated air then enters into the burner chamber (typically at a temperature very close to the temperature required for oxidation) where it is heated further to the final set point temperature (350°F for EtO).

The heated air stream then passes through the catalyst. 2,850 kg Clariant catalyst is used to achieve the required VOC destruction efficiency. VOC destruction takes place in the catalyst, where the VOC is destroyed at a rated DE  $\geq 99\%$ .

The clean (hot) air then passes from the catalyst through the "hot" side of the primary heat exchanger. In the heat exchanger, energy from the hot gas is used to preheat the incoming exhaust stream with no cross contamination. The clean (cooled) air is then routed through the secondary heat exchanger to pre-heat make-up air for the sterilization rooms.

After passing through this heat exchanger, exhaust vents to the atmosphere through the 35' tall, 34" diameter exhaust stack. A schematic of the recuperative catalytic oxidizer is presented in Figure 2-1.

#### **3.1 Sample Locations**

Sample was drawn from four sample ports at the inlet of each catalytic oxidizer, and two sampling ports located 90° apart located on each exhaust stack.

The inlet sampling port locations are located in each 24x48-inch inlet duct >256" (>8.0 Eq. diameters) downstream and 40" (1.25 Eq. diameters) upstream from any flow disturbances. In accordance with EPA Method 1, 16 traverse points were used for flow measurements performed during each emissions test.

The outlet sampling port locations are located in the 34-inch exhaust stack. This location is 2.3 diameters downstream and 6.7 diameters upstream from any flow disturbances, therefore, 12 traverse points chosen in accordance with Method 1 were used to perform flow measurements during each emissions test.

Figures 3-2 and 3-3 present photos of the inlet and outlet sample locations, respectively.

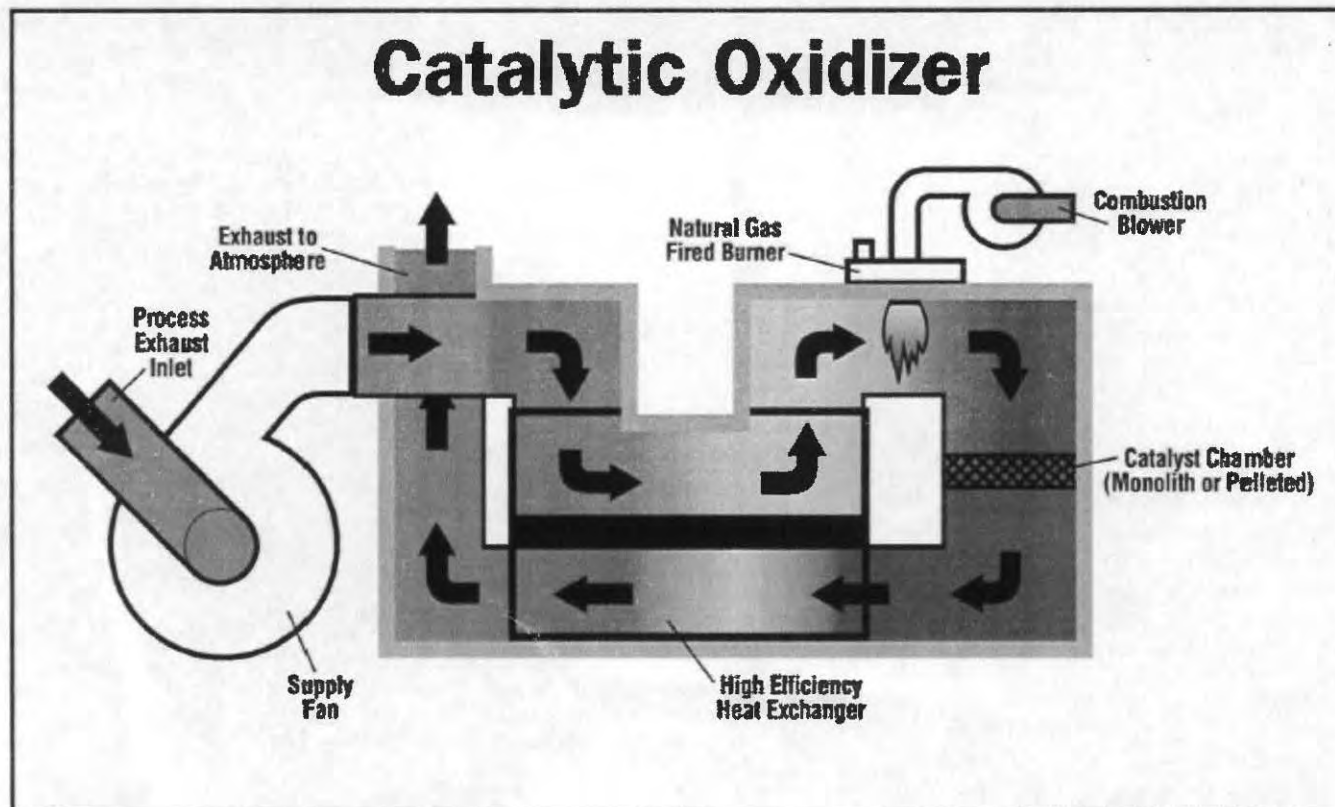
### **3.2 Process Operations**

During the test program, the aeration chambers were in continuous rotational operation, with the majority of aeration chambers in each of the four rooms filled during the test period. Logs showing chamber utilization during the test period are presented in Appendix C. Chambers with an Availability Date and Time subsequent to the test program time were active at the time of testing.

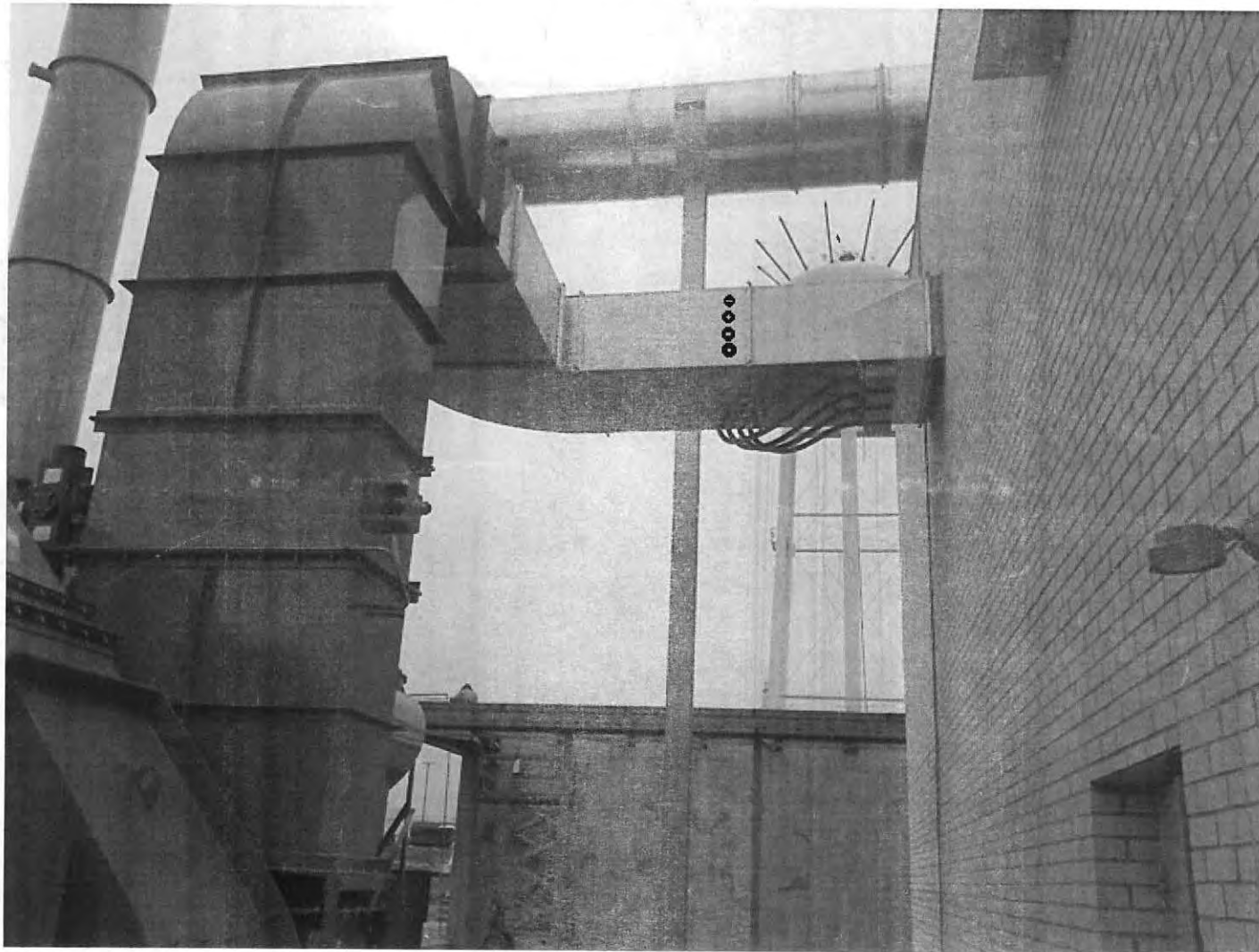
The catalytic oxidizers operated within 90% of rated capacity of 25,000 acfm exhausting both aeration rooms on that particular trunk. Catalyst inlet temperature was maintained at  $\geq 360^{\circ}\text{F}$  for Oxidizer A and  $\geq 350^{\circ}\text{F}$  for oxidizer B. Catalyst inlet temperature data is presented in Appendix C.



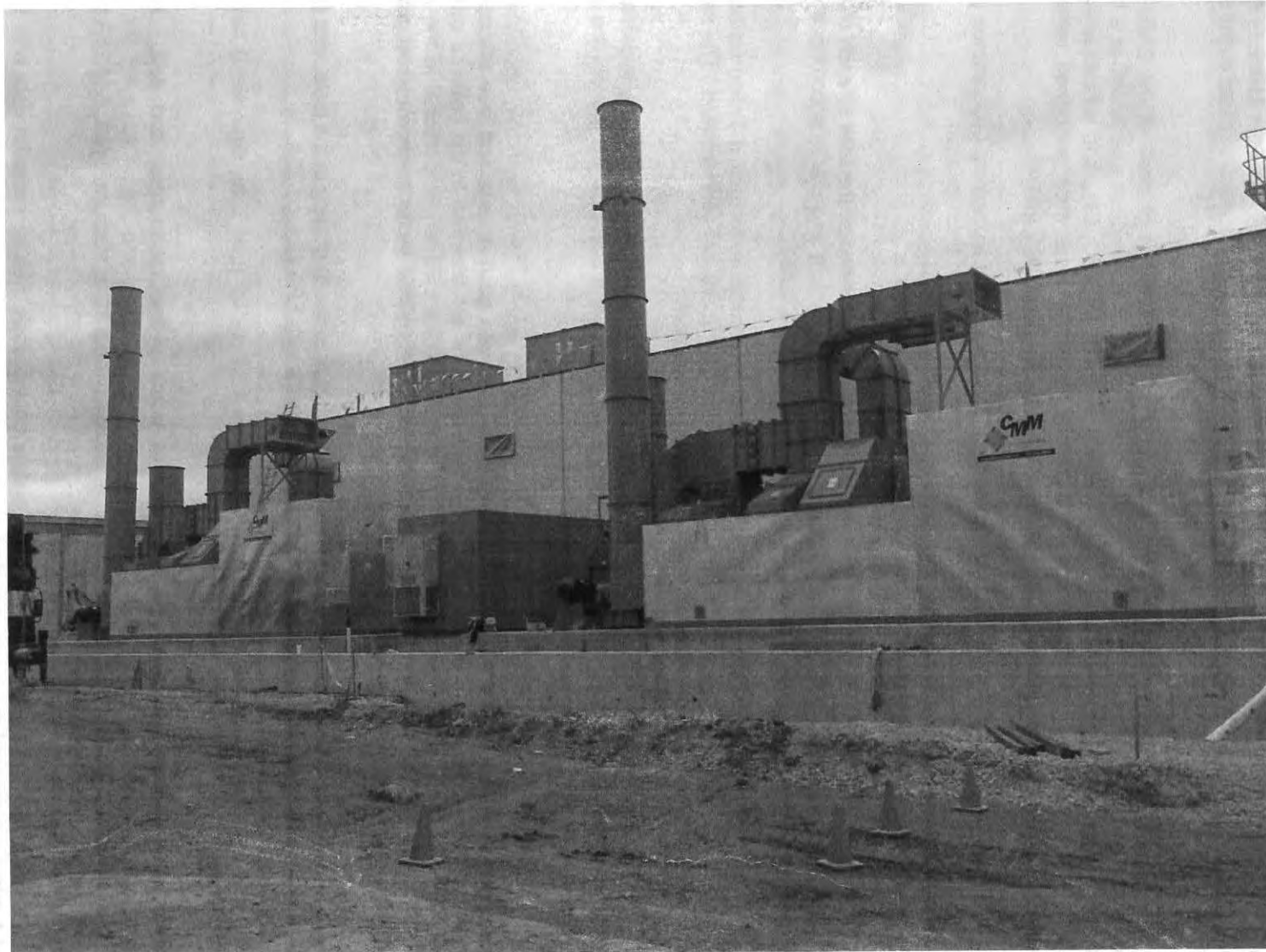
Figure 3-1 – Recuperative Catalytic Oxidizer



**Figure 3-2 – Catalytic Oxidizer Inlet Sample Location**



**Figure 3-3 – Catalytic Oxidizer Outlet Sampling Location**



#### **4.0 SAMPLING AND ANALYTICAL METHODOLOGY**

APCC performed a volatile organic compound (VOC) control efficiency (DE) test program on each of the two CMM Catalytic Oxidizers described above in accordance with EPA Methods 1, 2, 18 & 25A. Non-Methane Hydrocarbons (NMHC) concentration was analyzed at each oxidizer outlet in order to yield a non-methane hydrocarbon VOC (actual) control efficiency.

Sample was drawn from the inlet and outlet (simultaneously) of each of the CMM Catalytic Oxidizers through heated (320°F nominal) Teflon sample lines. One oxidizer was tested at a time. Inlet gas was sampled for THC only, while the outlet was sampled for THC, CH<sub>4</sub>, and subsequently NMHC, utilizing instrumentation described below. Triplicate 60-minute tests were performed under normal operating conditions at the inlet and outlet of each of the CMM Catalytic Oxidizers.

The IRM system is housed in one of APCC's Environmental Monitoring Laboratories (EML). A single sampling point in the centroid of the duct was used for testing at each location.

##### **4.1 Instrument Reference Method Monitoring – VOC/THC**

Instrument Reference Method (IRM) Monitoring was performed at the inlet of each of the CMM Catalytic Oxidizers using a VIG 20/2 (or equivalent) total hydrocarbon analyzer in accordance with EPA Method 25A. Data was recorded using an ESC 8816 digital data logger.

Stack gas is drawn through a stainless steel probe connected to heated Teflon calibration and sample lines. The sample lines are heated to 320°F (nominal) to prevent condensation. The sample line enters APCC's EML and is directly connected to the THC analyzer.

The analyzer utilizes a Flame Ionization Detector (FID) to measure, as carbon, hydrocarbons C<sub>1</sub> through C<sub>18</sub>; and is calibrated as CH<sub>4</sub>. Approximately 2.0 lpm are drawn from the sample line and enter the heated detector bench, which contains the FID.

Flame ionization is a process of continuously creating ions by flame, whereby, upon combustion, hydrocarbon molecules and carbon atoms are separated into positive ions and free electrons. The positive ions are attracted to the burner (-); the free electrons are attracted to the collector cylinder (+). An electron flow is established from the burner to the collector cylinder, proportional to the ionization created by the flame. The resulting current is detected and amplified by an electrometer/amplifier circuit and deflects an analog meter display.

THC analyzers are calibrated and leak checked prior to the beginning of the tests, and calibration and drift checks are performed between tests in accordance with EPA Method 25A.

The analyzer was calibrated on a 0-300 ppm CH<sub>4</sub> (0-100 ppm C<sub>3</sub>H<sub>8</sub> equivalent) range at the oxidizer inlet.

THC analyzer performance is defined in terms of calibration error and drift. Multi-point calibrations are performed to establish linearity prior to sampling and then throughout the program. Quality assurance objectives are defined by EPA and shall be met for each valid run. A M-25A calibration data sheet is presented in the Appendix.

An ESC 8816 digital data logger is used to continuously monitor emission data with 10-second and 1-minute integrated averages recorded.



## 4.2 Non-Methane Hydrocarbons

A VIG 200 THC/Methane/Non-Methane Hydrocarbon Analyzer, which utilizes dual flame ionization detectors (FID) for THC and CH<sub>4</sub>/NMHC; and a chromatographic column (CH<sub>4</sub>/NMHC); was used to determine THC, methane and non-methane hydrocarbon (NMHC) concentrations (measured as CH<sub>4</sub>) at the oxidizer outlet. Approximately 2 lpm of gas is drawn from the exhaust duct through a Teflon sample line heated to 320° F (nominal). The sample gas is drawn through a heated filter and valve by a heated pump. The sample gas then enters the heated detector bench, which contains the column and dual FIDs.

One fraction of the sample is continuously introduced to the FID for THC analyses. A second portion of the sample gas is injected onto the GC column at approximately 3-minute intervals. The column has an interior coating that separates organic compounds primarily by size (i.e. molecular weight) and boiling point. Methane is essentially a non-retained compound that elutes from the column first, and is then directed to the FID for analyses.

Following the elution of the methane, the flow through the column is reversed (back-flushed) and all non-methane constituents are flushed out and directed to the FID. The resulting current is detected and amplified by an electrometer/amplifier circuit. The output of the amplifier provides two usable signals to the recorder, for near real-time continuous monitoring of THC & CH<sub>4</sub>. Total hydrocarbon emissions are determined along with the methane component, with the resultant arithmetic difference being NMHC, which were utilized for DE calculation.

Calibrations were performed utilizing methane/propane mixed standards on a 0-30 ppm CH<sub>4</sub> and 0-60 ppm THC as CH<sub>4</sub>. Three standard concentrations and a zero N<sub>2</sub> were utilized.

## 4.3 Stack Gas Flow Rate

APCC determined volumetric flow rates of the effluent at the inlet and outlet sampling locations during each test described above in accordance with EPA Methods 1 and 2 using an S-type pitot and inclined manometer. The stack temperature is monitored by a thermocouple connected to a potentiometer.

Stack gas molecular weight was determined in accordance with EPA Method 3 calculations utilizing ambient concentrations of O<sub>2</sub> and CO<sub>2</sub>. In addition, stack gas moisture content was determined utilizing psychrometric measurements (wet/dry bulb). These measurements, however, are not used to calculate mass emission rates, as all measurements of emission concentration are performed on a hot/wet basis.

## 4.4 Emission Rate Calculations

Non-methane hydrocarbon (NMHC) concentration was determined utilizing sixty 1-minute average THC concentration measurements as CH<sub>4</sub> at the oxidizer inlet as well as corresponding calculated NMHC as CH<sub>4</sub> at the outlet in accordance with methods described above. Mass emission rates were determined as CH<sub>4</sub>, utilizing a molecular weight of 16 g/g-mole, in accordance with the following equation:

$$\text{MER} = \frac{\text{ppm} \times \text{mw}}{385.1 \text{ E6}} \times Q \times 60$$

Where: MER = Mass Emission Rate (lbs/hr)  
ppm = Concentration of NMHC  
mw = molecular weight of CH<sub>4</sub> (16)

Q = Volumetric Flow rate (scfm)

385.1 E6 = constant for units conversion taking into account mole volume, metric to English, STP, etc.

Destruction Efficiency (DE) was determined in accordance with the following equation:

$$\%DE = \frac{MER (inlet) - MER (outlet)}{MER (inlet)} \times 100$$

An EtO FID response factor of 1.3, with respect to methane, was utilized to determine concentrations of EtO measured as methane. Using this response factor, 1 ppm CH<sub>4</sub> equals 0.77 ppm EtO; or 1 ppm EtO is equivalent to 1.3 ppm CH<sub>4</sub>. These data were utilized to determine compliance with the alternate emission requirement of <1 ppm EtO.



## **5.0 QUALITY ASSURANCE**

The project manager is responsible for implementation of the quality assurance program as applied to the project.

### **5.1 Sampling Quality Assurance**

Generally, implementation of quality assurance procedures for source measurement programs is designed so that the work is done:

1. By competent, trained individuals experienced in the specific methodologies being used.
2. Using properly calibrated equipment.
3. Using approved procedures for sample handling and documentation.

Measurement devices, pitot tubes, dry gas meters, thermocouples and portable gas analyzers are uniquely identified and calibrated with documented procedures and acceptance criteria before and after each field effort. Records of all calibration data are maintained in the files.

Data are recorded on standard forms. Bound field notebooks are used to record observations and miscellaneous elements affecting data, calculations, or evaluation.

Prior to the test program APCC provides the following, as applicable:

1. Filter numbers and tare weights of all filters available for the test.
2. The results of reagent blank runs on the reagents to be used during the test.
3. Calibrations of all pitot tubes, dry gas meters, orifice meters, sampling nozzles, and thermocouples used during the test. All calibrations are performed within four months prior to the test date.

Specific details of APCC's QA program for stationary air pollution sources may be found in "Quality Assurance Handbook for Air Pollution Measurement Systems", Volume III (EPA-600/4-7-027b).

In addition to the test samples, blank samples of each collection media (reagents and filters) are collected at the test site for background analyses. All blank samples are analyzed in conjunction with actual test samples. Sampling results are corrected for these backgrounds if required.

Appropriate sample recovery data are recorded on the sample identification and handling logs, chain of custody forms and analytical data forms.

Recovered samples are stored in shock-proof containers for storage and shipment for analyses.

### **5.2 Analytical Quality Control**

APCC maintains a vigorous quality control program for all samples analyzed. This program is based on the general guidelines given in "Handbook for Analytical Quality Control in Water and Wastewater Laboratories" (EPA-600/4-79-019; March 1979). This program suggests guidelines in the areas of:

- Laboratory services
- Instrument selection

- Glassware
- Reagents
- Solvents
- Gases
- Analytical performance
- Data handling and reporting
- Water and wastewater sampling
- Laboratory safety

APCC has made additions to the EPA program which include the following:

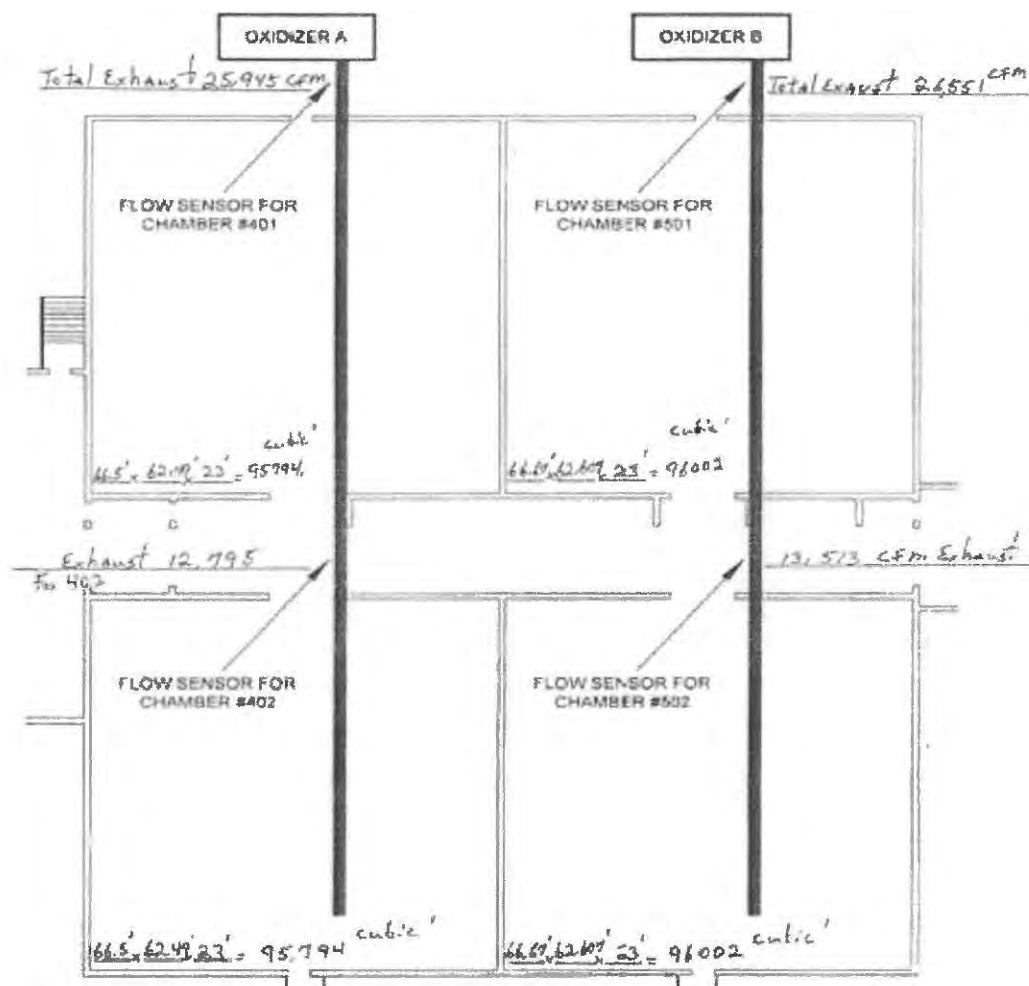
1. Triplicate analysis for each parameter on 10 percent of samples.
2. Ten percent of the samples are spiked by the laboratory manager with known amounts of the parameter of interest and re-analyzed to determine the percent recovery. A Shewhart control chart is used for the percent recovery control (EPA Handbook of Analytical Quality Control in Water and Wastewater Laboratories, 1979).
3. Standards and curves are determined for each analysis using the appropriate standard. Least squares linear regressions calculations are used in determining the "best fit" to the data. Correlation coefficients are also calculated.

### **5.3 Data Validation**

Validation of data is performed by the Program Manager against the QA/QC criteria of the specific methods. The data are assessed for quality and accuracy as required to meet the objectives of the test program. Sample calculations are performed with raw data separate from the reported calculations and results. All documentation is checked for correctness, completeness and verified as checked.

An assessment of sampling results is performed by the Program Manager. The data assessment is performed during scheduled time periods to ensure quality data was collected and processed. Corrective action is implemented, as warranted, to ensure QA/QC procedures were met.

## APPENDIX



$$\text{Lbs/hr} = \frac{\text{Lbs}}{\text{DSCF}} * \text{DSCFM} * 60$$

$$\text{Lbs/DSCF} = \frac{\text{ppm} * \text{Mw}}{385.1 * 10^6}$$

$$\text{Lbs/MMBtu} = \text{Lb/DSCF} * F_d * \frac{20.9}{20.9 - O_2}$$

#### **10. Lbs/hr by Heat Input**

$$\text{lbs/hr} = \text{lbs/MMBtu} / (\text{MMBtu/hr heat input})$$

#### **Where:**

Cp = Pitot Coefficient, (0.84 S-Type, 0.99 Standard)

Ts = Stack Temp. (°F)

As = Stack Area, (sq. ft.)

Y = Module Calib. Factor

Vi = Volume H2O Impingers, (ml.)

Vsg = Volume H2O Silica Gel

T = Time, (minutes)

Dn = Nozzle Diameter, (inches)

Vm = Meter Volume, (cubic feet)

Mw = Molecular Weight of Stack Gas, (lb / lb mole)

Pb = Barometric Pressure, (in. Hg)

DSCF = Dry Standard Cubic Feet

Mg = Milligrams

Fd = Fuel Factor (O<sub>2</sub> Dry)

Ps = Absolute Pressure in Stack (Pb + (P<sub>static</sub> / 13.6))

n = Number of Data Points

t0.975 = t-value from Table 2-1, 40 CFR 60 App. B, Spec. 2

|d| = Absolute Value of Mean of Difference Between CEMS and IRM System

|CC| = Absolute Value of Confidence Coefficient

RM = Reference Method Value

RA = Relative Accuracy of CEMS

## Sample Calculations

### 1. Duct Velocity (FPM)

$$V_s = 5129.4 \times C_p \times \text{SQRT} \Delta P_{\text{avg}} \times \text{SQRT}(T_s / (P_s \times M_w)) \quad (\Delta P \times \cos \emptyset \text{ if applic.})$$

### 2. Duct Volumetric Flowrate (ACFM)

$$Q_a = V_s \times A_s$$

### 3. Duct Volumetric Flowrate (DSCFM)

$$Q_{\text{std}} = Q_a \times \frac{528}{(T_s + 460)} \times \frac{P_s}{29.92} \times [1 - (\%H_2O/100)]$$

### 4. Meter Volume corrected to Standard Conditions (DSCF)

$$V_m(\text{std}) = V_m \times \gamma \times \frac{528}{(T_m + 460)} \times \frac{P_b + (\Delta H / 13.6)}{29.92}$$

### 5. Moisture Content of Stack Gas

$$\%H_2O = \frac{.04707 (V_i + V_{sg})}{V_m(\text{std}) + .04707 (V_i + V_{sg})}$$

### 6. Isokinetic Factor

$$\% \text{ Iso} = \frac{5.67 (T_s + 460) (V_m \text{ std})}{(P_b + (P_s/13.6) V_s T (1 - (\%H_2O) / 100) ((D_n^2 \times 0.7854) / 144)}$$

### 7. Module Sampling Rate

$$\Delta H = \Delta P \frac{[846.72 D_n \Delta H @ C_p (1 - \%H_2O)^2 M_d T_m P_s]}{M_s T_s P_b}$$

### 8. Stack Concentration

$$\text{ppm} = \frac{mg}{m^3} \times \frac{24.06}{M_w}$$

$$\text{ppm} = \frac{\text{Lbs/DSCF} \times (385.1 \times 10^6)}{M_w}$$

### 9. Pollutant Emission Rate

$$\text{Lbs/hr} = \text{ppm} \times \text{SCFM} \times M_w \times (15.58 \times 10^{-8})$$



**APPENDIX A**  
**Data Summaries**

|       |        |
|-------|--------|
| 576   | ° R    |
| 29.29 | in. Hg |
| 56    | ft/sec |
| 26824 | acfm   |
| 24068 | scfm   |
| 23828 | dscfm  |

**23624** dscfm



|       |        |
|-------|--------|
| 586   | ° R    |
| 29.46 | in. Hg |
| 74    | ft/sec |
| 28001 | acfm   |
| 24846 | scfm   |
| 24597 | dscfm  |

**23697 dscfm**



|       |        |
|-------|--------|
| 591   | ° R    |
| 29.45 | in. Hg |
| 82    | ft/sec |
| 31095 | acfm   |
| 27344 | scfm   |
| 27070 | dscfm  |

**24214 dscfm**

**25577** **dscfm**

**24140 dscfm**





**24512** dscfm



**25470 dscfm**

## **APPENDIX B**

### **Field Data**

| Date / Time     | CH4  | OUTLET   | INLET | Date / Time     | CH4      | OUTLET   | INLET    | Date / Time     | CH4      | OUTLET | INLET    |
|-----------------|------|----------|-------|-----------------|----------|----------|----------|-----------------|----------|--------|----------|
| 7/25/2016 11:03 | 5.3  | 5.6      | 32    | 7/25/2016 12:18 | 5        | 5.4      | 23       | 7/25/2016 13:38 | 4.7      | 5.4    | 30       |
| 7/25/2016 11:04 | 5.3  | 5.6      | 34    | 7/25/2016 12:19 | 5        | 5.2      | 20       | 7/25/2016 13:39 | 4.8      | 5.3    | 30       |
| 7/25/2016 11:05 | 5.3  | 5.3      | 32    | 7/25/2016 12:20 | 4.9      | 5.1      | 19       | 7/25/2016 13:40 | 4.8      | 5.2    | 30       |
| 7/25/2016 11:06 | 5.2  | 6        | 31    | 7/25/2016 12:21 | 4.6      | 5.2      | 19       | 7/25/2016 13:41 | 4.8      | 5.1    | 30       |
| 7/25/2016 11:07 | 5.2  | 5.9      | 31    | 7/25/2016 12:22 | 4.6      | 5        | 18       | 7/25/2016 13:42 | 4.8      | 5      | 30       |
| 7/25/2016 11:08 | 5.2  | 5.3      | 33    | 7/25/2016 12:23 | 4.6      | 5.1      | 18       | 7/25/2016 13:43 | 4.8      | 5      | 29       |
| 7/25/2016 11:09 | 5.2  | 5.9      | 34    | 7/25/2016 12:24 | 4.9      | 5.2      | 18       | 7/25/2016 13:44 | 4.7      | 4.9    | 30       |
| 7/25/2016 11:10 | 5.2  | 5.9      | 30    | 7/25/2016 12:25 | 4.9      | 5.1      | 18       | 7/25/2016 13:45 | 4.5      | 5      | 29       |
| 7/25/2016 11:11 | 5.1  | 6        | 32    | 7/25/2016 12:26 | 4.9      | 5.2      | 18       | 7/25/2016 13:46 | 4.5      | 5      | 29       |
| 7/25/2016 11:12 | 5.1  | 5.5      | 30    | 7/25/2016 12:27 | 5        | 5.2      | 18       | 7/25/2016 13:47 | 4.4      | 4.8    | 29       |
| 7/25/2016 11:13 | 5.1  | 5.8      | 33    | 7/25/2016 12:28 | 5        | 5.2      | 18       | 7/25/2016 13:48 | 4.3      | 4.9    | 29       |
| 7/25/2016 11:14 | 5.1  | 6.1      | 32    | 7/25/2016 12:29 | 5        | 5.2      | 18       | 7/25/2016 13:49 | 4.3      | 4.9    | 29       |
| 7/25/2016 11:15 | 5.4  | 5.9      | 30    | 7/25/2016 12:30 | 4.8      | 5.1      | 18       | 7/25/2016 13:50 | 4.4      | 5      | 28       |
| 7/25/2016 11:16 | 5.4  | 6        | 29    | 7/25/2016 12:31 | 4.8      | 5.4      | 18       | 7/25/2016 13:51 | 4.6      | 5      | 28       |
| 7/25/2016 11:17 | 5.5  | 6.7      | 32    | 7/25/2016 12:32 | 4.8      | 5.3      | 18       | 7/25/2016 13:52 | 4.6      | 5      | 28       |
| 7/25/2016 11:18 | 6    | 7        | 33    | 7/25/2016 12:33 | 4.9      | 5.1      | 18       | 7/25/2016 13:53 | 4.6      | 5.1    | 28       |
| 7/25/2016 11:19 | 6    | 6.5      | 30    | 7/25/2016 12:34 | 4.9      | 5.4      | 18       | 7/25/2016 13:54 | 4.7      | 5.1    | 28       |
| 7/25/2016 11:20 | 5.9  | 6.5      | 30    | 7/25/2016 12:35 | 4.9      | 5.4      | 18       | 7/25/2016 13:55 | 4.7      | 5.1    | 28       |
| 7/25/2016 11:21 | 5.4  | 6.3      | 31    | 7/25/2016 12:36 | 5.3      | 5.4      | 18       | 7/25/2016 13:56 | 4.7      | 5.1    | 28       |
| 7/25/2016 11:22 | 5.4  | 6.1      | 32    | 7/25/2016 12:37 | 5.3      | 5.4      | 18       | 7/25/2016 13:57 | 4.8      | 5.1    | 28       |
| 7/25/2016 11:23 | 5.3  | 5.8      | 31    | 7/25/2016 12:38 | 5.2      | 5.5      | 18       | 7/25/2016 13:58 | 4.8      | 5.1    | 29       |
| 7/25/2016 11:24 | 5    | 5.9      | 32    | 7/25/2016 12:39 | 5        | 5.5      | 18       | 7/25/2016 13:59 | 4.8      | 5.1    | 29       |
| 7/25/2016 11:25 | 5    | 6.1      | 29    | 7/25/2016 12:40 | 5        | 5.4      | 18       | 7/25/2016 14:00 | 4.8      | 5.4    | 30       |
| 7/25/2016 11:26 | 5    | 6.1      | 32    | 7/25/2016 12:41 | 4.9      | 5.3      | 18       | 7/25/2016 14:01 | 4.8      | 5.4    | 31       |
| 7/25/2016 11:27 | 5.1  | 5.3      | 31    | 7/25/2016 12:42 | 4.9      | 5.5      | 18       | 7/25/2016 14:02 | 4.7      | 5.2    | 31       |
| 7/25/2016 11:28 | 5.1  | 5.3      | 33    | 7/25/2016 12:43 | 4.9      | 5.6      | 18       | 7/25/2016 14:03 | 4.6      | 5.6    | 33       |
| 7/25/2016 11:29 | 5.2  | 5.2      | 33    | 7/25/2016 12:44 | 4.8      | 5.4      | 19       | 7/25/2016 14:04 | 4.6      | 5.6    | 34       |
| 7/25/2016 11:30 | 5.5  | 5.5      | 32    | 7/25/2016 12:45 | 4.7      | 5.7      | 19       | 7/25/2016 14:05 | 4.6      | 5.4    | 36       |
| 7/25/2016 11:31 | 5.5  | 5        | 32    | 7/25/2016 12:46 | 4.7      | 5.7      | 20       | 7/25/2016 14:06 | 4.6      | 5.6    | 37       |
| 7/25/2016 11:32 | 5.5  | 5.3      | 34    | 7/25/2016 12:47 | 4.7      | 5.6      | 21       | 7/25/2016 14:07 | 4.6      | 5.7    | 37       |
| 7/25/2016 11:33 | 5.4  | 5.9      | 37    | 7/25/2016 12:48 | 4.8      | 5.6      | 22       | 7/25/2016 14:08 | 4.7      | 5.5    | 38       |
| 7/25/2016 11:34 | 5.4  | 4.9      | 35    | 7/25/2016 12:49 | 4.8      | 5.8      | 23       | 7/25/2016 14:09 | 4.9      | 5.5    | 42       |
| 7/25/2016 11:35 | 5.4  | 5.3      | 35    | 7/25/2016 12:50 | 4.8      | 5.9      | 24       | 7/25/2016 14:10 | 4.9      | 5.7    | 41       |
| 7/25/2016 11:36 | 5.4  | 5.8      | 36    | 7/25/2016 12:51 | 4.9      | 6        | 27       | 7/25/2016 14:11 | 4.8      | 5.8    | 40       |
| 7/25/2016 11:37 | 5.4  | 5.7      | 39    | 7/25/2016 12:52 | 4.9      | 5.7      | 27       | 7/25/2016 14:12 | 4.4      | 5.7    | 44       |
| 7/25/2016 11:38 | 5.4  | 5.3      | 38    | 7/25/2016 12:53 | 4.9      | 6        | 26       | 7/25/2016 14:13 | 4.4      | 5.8    | 46       |
| 7/25/2016 11:39 | 5.1  | 5.5      | 35    | 7/25/2016 12:54 | 4.9      | 6        | 28       | 7/25/2016 14:14 | 4.5      | 6.1    | 44       |
| 7/25/2016 11:40 | 5.1  | 5.9      | 36    | 7/25/2016 12:55 | 4.9      | 5.7      | 30       | 7/25/2016 14:15 | 5        | 6.1    | 46       |
| 7/25/2016 11:41 | 5.1  | 5.6      | 40    | 7/25/2016 12:56 | 5        | 6        | 28       | 7/25/2016 14:16 | 5        | 5.9    | 49       |
| 7/25/2016 11:42 | 5    | 5.5      | 37    | 7/25/2016 12:57 | 5.6      | 6.1      | 29       | 7/25/2016 14:17 | 5        | 6.2    | 50       |
| 7/25/2016 11:43 | 5    | 5.7      | 35    | 7/25/2016 12:58 | 5.6      | 5.8      | 31       | 7/25/2016 14:18 | 5.2      | 6.3    | 49       |
| 7/25/2016 11:44 | 5.1  | 6.3      | 36    | 7/25/2016 12:59 | 5.5      | 5.7      | 33       | 7/25/2016 14:19 | 5.2      | 6.2    | 50       |
| 7/25/2016 11:45 | 5.4  | 5.8      | 36    | 7/25/2016 13:00 | 5.3      | 5.7      | 31       | 7/25/2016 14:20 | 5.1      | 6.2    | 53       |
| 7/25/2016 11:46 | 5.4  | 5.7      | 39    | 7/25/2016 13:01 | 5.3      | 5.4      | 32       | 7/25/2016 14:21 | 4.9      | 6.6    | 57       |
| 7/25/2016 11:47 | 5.4  | 6.4      | 37    | 7/25/2016 13:02 | 5.3      | 5.6      | 34       | 7/25/2016 14:22 | 4.9      | 6.5    | 55       |
| 7/25/2016 11:48 | 5.5  | 6.4      | 36    | 7/25/2016 13:03 | 5.4      | 5.8      | 34       | 7/25/2016 14:23 | 4.9      | 6.4    | 54       |
| 7/25/2016 11:49 | 5.5  | 5.8      | 36    | 7/25/2016 13:04 | 5.4      | 5.4      | 34       | 7/25/2016 14:24 | 4.9      | 7      | 55       |
| 7/25/2016 11:50 | 5.4  | 5.9      | 36    | 7/25/2016 13:05 | 5.3      | 5.5      | 35       | 7/25/2016 14:25 | 4.9      | 6.9    | 57       |
| 7/25/2016 11:51 | 5.2  | 6.5      | 39    | 7/25/2016 13:06 | 5        | 5.8      | 35       | 7/25/2016 14:26 | 4.9      | 6.7    | 57       |
| 7/25/2016 11:52 | 5.2  | 6.4      | 36    | 7/25/2016 13:07 | 5        | 5.7      | 35       | 7/25/2016 14:27 | 4.9      | 6.5    | 53       |
| 7/25/2016 11:53 | 5.1  | 6        | 35    | 7/25/2016 13:08 | 5        | 5.6      | 35       | 7/25/2016 14:28 | 4.9      | 6.7    | 55       |
| 7/25/2016 11:54 | 4.5  | 6.1      | 35    | 7/25/2016 13:09 | 5        | 5.8      | 35       | 7/25/2016 14:29 | 4.9      | 7      | 57       |
| 7/25/2016 11:55 | 4.5  | 6.7      | 39    | 7/25/2016 13:10 | 5        | 5.8      | 34       | 7/25/2016 14:30 | 5.1      | 6.7    | 58       |
| 7/25/2016 11:56 | 4    | 6.6      | 36    | 7/25/2016 13:11 | 5        | 5.6      | 35       | 7/25/2016 14:31 | 5.1      | 6.7    | 61       |
| 7/25/2016 11:57 | 1.5  | 5.9      | 34    | 7/25/2016 13:12 | 5        | 5.8      | 38       | 7/25/2016 14:32 | 5.1      | 6.8    | 56       |
| 7/25/2016 11:58 | 1.5  | 6.3      | 34    | 7/25/2016 13:13 | 5        | 6.1      | 34       | 7/25/2016 14:33 | 5.2      | 7      | 56       |
| 7/25/2016 11:59 | 2.2  | 6.9      | 37    | 7/25/2016 13:14 | 5        | 5.9      | 32       | 7/25/2016 14:34 | 5.2      | 7.1    | 52       |
| 7/25/2016 12:00 | 5.4  | 6.3      | 35    | 7/25/2016 13:15 | 4.8      | 5.5      | 37       | 7/25/2016 14:35 | 5.1      | 6.5    | 51       |
| 7/25/2016 12:01 | 5.4  | 6.1      | 32    | 7/25/2016 13:16 | 4.8      | 6.1      | 38       | 7/25/2016 14:36 | 4.5      | 7      | 53       |
| 7/25/2016 12:02 | 5.4  | 6.8      | 33    | 7/25/2016 13:17 | 4.9      | 6.2      | 35       | 7/25/2016 14:37 | 4.5      | 7.2    | 51       |
| Average         | 5.08 | 5.923333 | 33.9  | Average         | 4.983333 | 5.556667 | 25.11667 | Average         | 4.773333 | 5.79   | 40.41667 |
| Maximum         | 6    | 7        | 40    | Maximum         | 5.6      | 6.2      | 38       | Maximum         | 5.2      | 7.2    | 58       |
| Minimum         | 1.5  | 4.9      | 29    | Minimum         | 4.6      | 5        | 18       | Minimum         | 4.3      | 4.8    | 28       |

| Date / Time    | CH4      | OUTLET | INLET    | Date / Time     | CH4      | OUTLET | INLET    | Date / Time     | CH4   | OUTLET   | INLET    |
|----------------|----------|--------|----------|-----------------|----------|--------|----------|-----------------|-------|----------|----------|
| 7/26/2016 8:30 | 7.8      | 7.1    | 16       | 7/26/2016 9:44  | 7.6      | 6.8    | 18       | 7/26/2016 11:00 | 7.1   | 7.4      | 13       |
| 7/26/2016 8:31 | 7.8      | 7.1    | 16       | 7/26/2016 9:45  | 7.6      | 6.8    | 16       | 7/26/2016 11:01 | 7.1   | 7.3      | 13       |
| 7/26/2016 8:32 | 7.9      | 7.3    | 16       | 7/26/2016 9:46  | 7.6      | 6.8    | 15       | 7/26/2016 11:02 | 7.2   | 7.3      | 12       |
| 7/26/2016 8:33 | 8.1      | 7.2    | 16       | 7/26/2016 9:47  | 7.4      | 6.7    | 14       | 7/26/2016 11:03 | 7.3   | 7        | 13       |
| 7/26/2016 8:34 | 8.1      | 6.9    | 16       | 7/26/2016 9:48  | 7.2      | 6.8    | 14       | 7/26/2016 11:04 | 7.3   | 6.8      | 12       |
| 7/26/2016 8:35 | 8.1      | 7.2    | 16       | 7/26/2016 9:49  | 7.2      | 6.7    | 13       | 7/26/2016 11:05 | 7.2   | 6.9      | 12       |
| 7/26/2016 8:36 | 8.1      | 6.9    | 16       | 7/26/2016 9:50  | 7.2      | 6.7    | 13       | 7/26/2016 11:06 | 7.1   | 7        | 13       |
| 7/26/2016 8:37 | 8.1      | 6.7    | 16       | 7/26/2016 9:51  | 7.3      | 6.5    | 13       | 7/26/2016 11:07 | 7.1   | 6.9      | 13       |
| 7/26/2016 8:38 | 7.9      | 6.9    | 16       | 7/26/2016 9:52  | 7.3      | 6.7    | 13       | 7/26/2016 11:08 | 6.9   | 6.7      | 12       |
| 7/26/2016 8:39 | 7.6      | 7      | 16       | 7/26/2016 9:53  | 7.2      | 6.7    | 13       | 7/26/2016 11:09 | 6.6   | 6.8      | 12       |
| 7/26/2016 8:40 | 7.6      | 7.1    | 16       | 7/26/2016 9:54  | 7.1      | 6.7    | 13       | 7/26/2016 11:10 | 6.6   | 6.8      | 13       |
| 7/26/2016 8:41 | 7.6      | 6.7    | 16       | 7/26/2016 9:55  | 7.1      | 6.7    | 13       | 7/26/2016 11:11 | 6.8   | 6.8      | 13       |
| 7/26/2016 8:42 | 7.7      | 7      | 16       | 7/26/2016 9:56  | 7.2      | 6.7    | 13       | 7/26/2016 11:12 | 7.2   | 6.7      | 12       |
| 7/26/2016 8:43 | 7.7      | 7.2    | 15       | 7/26/2016 9:57  | 7.4      | 6.7    | 13       | 7/26/2016 11:13 | 7.2   | 6.9      | 12       |
| 7/26/2016 8:44 | 7.8      | 7      | 15       | 7/26/2016 9:58  | 7.4      | 6.8    | 12       | 7/26/2016 11:14 | 7.3   | 6.8      | 12       |
| 7/26/2016 8:45 | 7.9      | 7      | 16       | 7/26/2016 9:59  | 7.3      | 6.8    | 12       | 7/26/2016 11:15 | 7.4   | 6.6      | 12       |
| 7/26/2016 8:46 | 7.9      | 7.1    | 16       | 7/26/2016 10:00 | 7.2      | 6.6    | 12       | 7/26/2016 11:16 | 7.4   | 6.7      | 12       |
| 7/26/2016 8:47 | 8        | 7.6    | 16       | 7/26/2016 10:01 | 7.2      | 6.7    | 12       | 7/26/2016 11:17 | 7.2   | 6.8      | 12       |
| 7/26/2016 8:48 | 8.3      | 8.1    | 17       | 7/26/2016 10:02 | 7.2      | 6.8    | 12       | 7/26/2016 11:18 | 7.1   | 6.6      | 12       |
| 7/26/2016 8:49 | 8.3      | 8.1    | 17       | 7/26/2016 10:03 | 7.4      | 6.7    | 11       | 7/26/2016 11:19 | 7.1   | 6.4      | 12       |
| 7/26/2016 8:50 | 8.2      | 7.9    | 19       | 7/26/2016 10:04 | 7.4      | 6.7    | 11       | 7/26/2016 11:20 | 7     | 6.5      | 11       |
| 7/26/2016 8:51 | 8.2      | 7.6    | 20       | 7/26/2016 10:05 | 7.4      | 6.7    | 11       | 7/26/2016 11:21 | 6.9   | 6.8      | 12       |
| 7/26/2016 8:52 | 8.2      | 8.2    | 21       | 7/26/2016 10:06 | 7.4      | 6.8    | 11       | 7/26/2016 11:22 | 6.9   | 6.8      | 12       |
| 7/26/2016 8:53 | 8        | 7.9    | 24       | 7/26/2016 10:07 | 7.4      | 6.7    | 11       | 7/26/2016 11:23 | 6.9   | 6.6      | 12       |
| 7/26/2016 8:54 | 7.8      | 7.7    | 27       | 7/26/2016 10:08 | 7.4      | 6.8    | 11       | 7/26/2016 11:24 | 7     | 6.7      | 12       |
| 7/26/2016 8:55 | 7.8      | 7.8    | 27       | 7/26/2016 10:09 | 7.5      | 6.8    | 11       | 7/26/2016 11:25 | 7     | 6.9      | 12       |
| 7/26/2016 8:56 | 7.8      | 8      | 29       | 7/26/2016 10:10 | 7.5      | 6.9    | 11       | 7/26/2016 11:26 | 7.1   | 6.7      | 11       |
| 7/26/2016 8:57 | 7.9      | 7.9    | 32       | 7/26/2016 10:11 | 7.4      | 6.7    | 11       | 7/26/2016 11:27 | 7.4   | 6.8      | 12       |
| 7/26/2016 8:58 | 7.9      | 7.9    | 33       | 7/26/2016 10:12 | 7.2      | 6.7    | 11       | 7/26/2016 11:28 | 7.4   | 7        | 12       |
| 7/26/2016 8:59 | 8        | 8      | 32       | 7/26/2016 10:13 | 7.2      | 6.9    | 11       | 7/26/2016 11:29 | 7.4   | 6.9      | 12       |
| 7/26/2016 9:00 | 8.2      | 7.9    | 33       | 7/26/2016 10:14 | 7.4      | 6.9    | 11       | 7/26/2016 11:30 | 7.5   | 6.9      | 12       |
| 7/26/2016 9:01 | 8.2      | 7.9    | 35       | 7/26/2016 10:15 | 7.9      | 7.1    | 11       | 7/26/2016 11:31 | 7.5   | 7.2      | 13       |
| 7/26/2016 9:02 | 8.2      | 7.8    | 35       | 7/26/2016 10:16 | 7.9      | 6.8    | 11       | 7/26/2016 11:32 | 7.4   | 6.9      | 13       |
| 7/26/2016 9:03 | 8.3      | 8      | 31       | 7/26/2016 10:17 | 7.7      | 6.9    | 11       | 7/26/2016 11:33 | 7.1   | 7        | 13       |
| 7/26/2016 9:04 | 8.3      | 8      | 34       | 7/26/2016 10:18 | 7.3      | 7.3    | 11       | 7/26/2016 11:34 | 7.1   | 7.3      | 14       |
| 7/26/2016 9:05 | 8.1      | 7.8    | 36       | 7/26/2016 10:19 | 7.3      | 7.1    | 12       | 7/26/2016 11:35 | 7.1   | 7        | 15       |
| 7/26/2016 9:06 | 7.9      | 8      | 36       | 7/26/2016 10:20 | 7.2      | 7.2    | 13       | 7/26/2016 11:36 | 7.2   | 7        | 15       |
| 7/26/2016 9:07 | 7.9      | 8.1    | 35       | 7/26/2016 10:21 | 7.1      | 7.2    | 13       | 7/26/2016 11:37 | 7.2   | 7.1      | 15       |
| 7/26/2016 9:08 | 7.7      | 7.8    | 37       | 7/26/2016 10:22 | 7.1      | 7.2    | 14       | 7/26/2016 11:38 | 7.2   | 7        | 16       |
| 7/26/2016 9:09 | 7.5      | 7.8    | 40       | 7/26/2016 10:23 | 7.2      | 7.4    | 15       | 7/26/2016 11:39 | 7.2   | 6.9      | 16       |
| 7/26/2016 9:10 | 7.5      | 7.9    | 40       | 7/26/2016 10:24 | 7.3      | 7.2    | 16       | 7/26/2016 11:40 | 7.2   | 7        | 17       |
| 7/26/2016 9:11 | 7.6      | 8.2    | 37       | 7/26/2016 10:25 | 7.3      | 7.3    | 16       | 7/26/2016 11:41 | 7.2   | 7.3      | 16       |
| 7/26/2016 9:12 | 7.9      | 8.1    | 37       | 7/26/2016 10:26 | 7.4      | 7.5    | 16       | 7/26/2016 11:42 | 7.3   | 7.2      | 17       |
| 7/26/2016 9:13 | 7.9      | 7.8    | 41       | 7/26/2016 10:27 | 7.5      | 7.1    | 18       | 7/26/2016 11:43 | 7.3   | 7.1      | 18       |
| 7/26/2016 9:14 | 7.9      | 8      | 38       | 7/26/2016 10:28 | 7.5      | 7.6    | 19       | 7/26/2016 11:44 | 7.2   | 7        | 18       |
| 7/26/2016 9:15 | 8.1      | 8.1    | 34       | 7/26/2016 10:29 | 7.6      | 7.3    | 18       | 7/26/2016 11:45 | 7     | 7.3      | 18       |
| 7/26/2016 9:16 | 8.1      | 8.4    | 35       | 7/26/2016 10:30 | 7.9      | 7.4    | 19       | 7/26/2016 11:46 | 7     | 7.4      | 19       |
| 7/26/2016 9:17 | 8        | 8.2    | 36       | 7/26/2016 10:31 | 7.9      | 7.4    | 21       | 7/26/2016 11:47 | 7     | 7.2      | 20       |
| 7/26/2016 9:18 | 7.8      | 7.9    | 32       | 7/26/2016 10:32 | 7.9      | 7.4    | 22       | 7/26/2016 11:48 | 7.2   | 7.5      | 20       |
| 7/26/2016 9:19 | 7.8      | 8      | 29       | 7/26/2016 10:33 | 7.9      | 7.4    | 21       | 7/26/2016 11:49 | 7.2   | 7.2      | 20       |
| 7/26/2016 9:20 | 7.9      | 8.6    | 31       | 7/26/2016 10:34 | 7.9      | 7.6    | 21       | 7/26/2016 11:50 | 7.2   | 7.4      | 21       |
| 7/26/2016 9:21 | 8.1      | 8.2    | 31       | 7/26/2016 10:35 | 7.8      | 7.4    | 22       | 7/26/2016 11:51 | 7.2   | 7.5      | 22       |
| 7/26/2016 9:22 | 8.1      | 8.2    | 28       | 7/26/2016 10:36 | 7.8      | 7.2    | 22       | 7/26/2016 11:52 | 7.2   | 7.2      | 23       |
| 7/26/2016 9:23 | 8.1      | 8.3    | 27       | 7/26/2016 10:37 | 7.8      | 7.6    | 22       | 7/26/2016 11:53 | 7     | 7.3      | 22       |
| 7/26/2016 9:24 | 8        | 8.8    | 27       | 7/26/2016 10:38 | 7.7      | 7.7    | 23       | 7/26/2016 11:54 | 6.9   | 7.9      | 23       |
| 7/26/2016 9:25 | 8        | 8.3    | 28       | 7/26/2016 10:39 | 7.6      | 7.5    | 22       | 7/26/2016 11:55 | 6.9   | 7.6      | 25       |
| 7/26/2016 9:26 | 8.2      | 8.2    | 27       | 7/26/2016 10:40 | 7.6      | 7.2    | 22       | 7/26/2016 11:56 | 7.1   | 7.4      | 22       |
| 7/26/2016 9:27 | 8.5      | 8.7    | 26       | 7/26/2016 10:41 | 7.7      | 7.6    | 23       | 7/26/2016 11:57 | 7.5   | 7.5      | 24       |
| 7/26/2016 9:28 | 8.5      | 8.6    | 27       | 7/26/2016 10:42 | 7.8      | 7.9    | 23       | 7/26/2016 11:58 | 7.5   | 7.8      | 22       |
| 7/26/2016 9:29 | 8.3      | 8.5    | 27       | 7/26/2016 10:43 | 7.8      | 7.6    | 24       | 7/26/2016 11:59 | 7.5   | 7.6      | 25       |
| Average        | 7.978333 | 7.77   | 26.23333 | Average         | 7.461667 | 7.035  | 15.11667 | Average         | 7.155 | 7.043333 | 15.31667 |
| Maximum        | 8.5      | 8.8    | 41       | Maximum         | 7.9      | 7.9    | 24       | Maximum         | 7.5   | 7.9      | 25       |
| Minimum        | 7.5      | 6.7    | 15       | Minimum         | 7.1      | 6.5    | 11       | Minimum         | 6.6   | 6.4      | 11       |

**APPENDIX C**  
**Process Data**





Oxidizer B Cat

Temperature 15

| DateTimeStamp     | Minute Average |
|-------------------|----------------|
| 07/25/16 11:04 AM | 354.10001      |
| 07/25/16 11:09 AM | 354.21429      |
| 07/25/16 11:14 AM | 354.34167      |
| 07/25/16 11:19 AM | 354.29999      |
| 07/25/16 11:24 AM | 354.39999      |
| 07/25/16 11:29 AM | 354.37271      |
| 07/25/16 11:34 AM | 354.39999      |
| 07/25/16 11:39 AM | 354.41998      |
| 07/25/16 11:44 AM | 354.35999      |
| 07/25/16 11:49 AM | 354.35999      |
| 07/25/16 11:54 AM | 354.34998      |
| 07/25/16 11:59 AM | 354.36667      |
| 07/25/16 12:04 PM | 354.40714      |
| 07/25/16 12:09 PM | 354.43332      |
| 07/25/16 12:14 PM | 354.45001      |
| 07/25/16 12:19 PM | 354.43076      |
| 07/25/16 12:24 PM | 354.60001      |
| 07/25/16 12:29 PM | 354.5          |
| 07/25/16 12:34 PM | 354.47501      |
| 07/25/16 12:39 PM | 354.39999      |
| 07/25/16 12:44 PM | 354.48334      |
| 07/25/16 12:49 PM | 354.49091      |
| 07/25/16 12:54 PM | 354.5          |
| 07/25/16 12:59 PM | 354.5          |
| 07/25/16 01:04 PM | 354.48001      |
| 07/25/16 01:09 PM | 354.48001      |
| 07/25/16 01:14 PM | 354.42499      |
| 07/25/16 01:19 PM | 354.4111       |
| 07/25/16 01:24 PM | 354.39999      |
| 07/25/16 01:29 PM | 354.39999      |
| 07/25/16 01:34 PM | 354.41251      |
| 07/25/16 01:39 PM | 354.39999      |
| 07/25/16 01:44 PM | 354.45001      |
| 07/25/16 01:49 PM | 354.45715      |
| 07/25/16 01:54 PM | 354.43332      |
| 07/25/16 01:59 PM | 354.20001      |
| 07/25/16 02:04 PM | 354.31665      |
| 07/25/16 02:09 PM | 354.35455      |
| 07/25/16 02:14 PM | 354.5          |
| 07/25/16 02:19 PM | 354.44         |
| 07/25/16 02:24 PM | 354.35001      |
| 07/25/16 02:29 PM | 354.5          |
| 07/25/16 02:34 PM | 354.5          |
| 07/25/16 02:39 PM | 354.51999      |
| 07/25/16 02:44 PM | 354.45334      |
| 07/25/16 02:49 PM | 354.25         |
| 07/25/16 02:54 PM | 354.3222       |
| 07/25/16 02:59 PM | 354.35715      |
| 07/25/16 03:04 PM | 353.96667      |
| 07/25/16 03:09 PM | 354.0625       |
| 07/25/16 03:14 PM | 354.19229      |
| 07/25/16 03:19 PM | 354.39999      |
| 07/25/16 03:24 PM | 354.32858      |
| 07/25/16 03:29 PM | 354.27499      |
| 07/25/16 03:34 PM | 354.10001      |
| 07/25/16 03:39 PM | 354.04999      |
| 07/25/16 03:44 PM | 354.14545      |
| 07/25/16 03:49 PM | 354.29999      |
| Average           | 354.3670548    |

Oxidizer A Cat

Temperature 15

| DateTimeStamp     | Minute Average |
|-------------------|----------------|
| 07/26/16 08:34 AM | 364.25385      |
| 07/26/16 08:39 AM | 364.29999      |
| 07/26/16 08:44 AM | 364.32855      |
| 07/26/16 08:49 AM | 364.28333      |
| 07/26/16 08:54 AM | 364.29999      |
| 07/26/16 08:59 AM | 364.18335      |
| 07/26/16 09:04 AM | 364.20001      |
| 07/26/16 09:09 AM | 364.10001      |
| 07/26/16 09:14 AM | 364.08002      |
| 07/26/16 09:19 AM | 364.10001      |
| 07/26/16 09:24 AM | 364.08667      |
| 07/26/16 09:29 AM | 364.125        |
| 07/26/16 09:34 AM | 364.14444      |
| 07/26/16 09:39 AM | 364.13571      |
| 07/26/16 09:44 AM | 364.16669      |
| 07/26/16 09:49 AM | 364.13751      |
| 07/26/16 09:54 AM | 364.14615      |
| 07/26/16 09:59 AM | 363.89999      |
| 07/26/16 10:04 AM | 363.89999      |
| 07/26/16 10:09 AM | 363.85834      |
| 07/26/16 10:14 AM | 364.29999      |
| 07/26/16 10:19 AM | 364.26666      |
| 07/26/16 10:24 AM | 364.18182      |
| 07/26/16 10:29 AM | 364.10001      |
| 07/26/16 10:34 AM | 364.01999      |
| 07/26/16 10:39 AM | 364.04999      |
| 07/26/16 10:44 AM | 364.03333      |
| 07/26/16 10:49 AM | 364.15002      |
| 07/26/16 10:54 AM | 364.07779      |
| 07/26/16 10:59 AM | 364.02856      |
| 07/26/16 11:04 AM | 363.70001      |
| 07/26/16 11:09 AM | 363.73749      |
| 07/26/16 11:14 AM | 363.81537      |
| 07/26/16 11:19 AM | 364            |
| 07/26/16 11:24 AM | 363.95715      |
| 07/26/16 11:29 AM | 363.96667      |
| 07/26/16 11:34 AM | 364            |
| 07/26/16 11:39 AM | 364.01666      |
| 07/26/16 11:44 AM | 363.98181      |
| 07/26/16 11:49 AM | 363.89999      |
| 07/26/16 11:54 AM | 364.01666      |
| 07/26/16 11:59 AM | 363.99091      |
| 07/26/16 12:04 PM | 363.89999      |
| Average           | 364.0679179    |

**APPENDIX D**  
**Calibration Data**

**APCC  
CEM CALIBRATION DATA  
EPA Method 25A**

|              |                   |                 |           |
|--------------|-------------------|-----------------|-----------|
| Project No.: | 16020             | Date:           | 25-Jul-16 |
| Plant/Firm:  | Baxter Healthcare | Analyzer:       | Vig 20/2  |
| Source:      | Oxidizer B        | Span Value:     | 300       |
| Location:    | Inlet             | Analyzer Range: | 1000      |
|              |                   | Cal Gas:        | methane   |

**PRE-TEST Calibration And Linearity:**

|                     | Zero | Low Range | Mid Range | High Range |
|---------------------|------|-----------|-----------|------------|
| Cal Gas Cyl. Value: | 0.0  | 85.7      | 175.0     | 290.8      |
| Cal Response:       | 0.0  | 89        | 178       | 291        |
| Slope:              |      | 1.0007    | 1.0007    | 1.0007     |
| Predicted Response: |      | 85.8      | 175.1     |            |
| Cal Error (<5%):    |      | 3.8%      | 1.6%      |            |

**Calibration Drift Check:**

**Run 1**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 0                    | 5.0                  | 1.7         |
| 85.7      | 89                   | 91.7                 | 0.9         |

**Run 2**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 5.0                  | 5.8                  | 0.3         |
| 85.7      | 91.7                 | 97                   | 1.8         |

**Run 3**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 5.8                  | 5.6                  | 0.1         |
| 85.7      | 97                   | 100                  | 1.0         |

Slope, M:  $M = \frac{C_{ma} - C_o}{C_m}$

$C_{ma}$  = Span Cal Gas Cyl. Value  
 $C_m$  = Calibration response  
 $C_o$  = Zero response

Predicted Response, PR:

$$PR = M * C_{ma} + C_o$$

Calibration Error Calculation, Cerr:

$$Cerr = \frac{C_m - Pr}{C_{ma}} \times 100$$

Calibration Drift Calculation, Cd:

$$Cd = \frac{\text{Pre Cal Response} - \text{Post Cal Response}}{\text{Span}}$$

**APCC  
CEM CALIBRATION DATA  
EPA Method 25A**

|              |                   |                 |           |
|--------------|-------------------|-----------------|-----------|
| Project No.: | 16020             | Date:           | 25-Jul-16 |
| Plant/Firm:  | Baxter Healthcare | Analyzer:       | Vig 200   |
| Source ID:   | Oxidizer B        | Span Value:     | 60        |
| Location:    | Outlet            | Analyzer Range: | 100       |
|              |                   | Cal Gas:        | methane   |

**PRE-TEST Calibration And Linearity:**

|                     | Zero | Low Range | Mid Range | High Range |
|---------------------|------|-----------|-----------|------------|
| Cal Gas Cyl. Value: | 0.0  | 19.2      | 31.1      | 56.8       |
| Cal Response:       | 0.0  | 19.1      | 31.8      | 56.7       |
| Slope:              |      | 0.9982    | 0.9982    | 0.9982     |
| Predicted Response: |      | 19.2      | 31.0      |            |
| Cal Error (<5%):    |      | -0.3%     | 2.4%      |            |

**Calibration Drift Check:**

**Run 1**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 0                    | 0.0                  | 0.0         |
| 19.2      | 19.1                 | 18.5                 | 1.0         |

**Run 2**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 0.0                  | 0.2                  | 0.3         |
| 19.2      | 18.5                 | 18.3                 | 0.3         |

**Run 3**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 0.2                  | 0.1                  | 0.2         |
| 19.2      | 18.3                 | 18.8                 | 0.8         |

Slope, M:  $M = \frac{C_{ma} - C_o}{C_m}$

$C_{ma}$  = Span Cal Gas Cyl. Value  
 $C_m$  = Calibration response  
 $C_o$  = Zero response

Predicted Response, PR:

$$PR = M * C_{ma} + C_o$$

Calibration Error Calculation, Cerr:

$$C_{err} = \frac{C_m - PR}{C_{ma}} \times 100$$

Calibration Drift Calculation, Cd:

$$Cd = \frac{\text{Pre Cal Response} - \text{Post Cal Response}}{\text{Span}}$$

**APCC  
CEM CALIBRATION DATA  
EPA Method 25A**

Project No.: 16020  
Plant/Firm: Baxter Healthcare  
Source ID: Oxidizer B  
Location: Outlet

Date: 25-Jul-16  
Analyzer: Vig 200  
Span Value: 35  
Analyzer Range: 100  
Cal Gas: methane/propane

**PRE-TEST Calibration And Linearity:**

|                     | Zero | Low Range | Mid Range | High Range |
|---------------------|------|-----------|-----------|------------|
| Cal Gas Cyl. Value: | 0.0  | 9.3       | 15.2      | 30.1       |
| Cal Response:       | 0.0  | 9.3       | 15.1      | 29.8       |
| Slope:              |      | 0.9900    | 0.9900    | 0.9900     |
| Predicted Response: |      | 9.2       | 15.0      |            |
| Cal Error (<5%):    |      | 1.0%      | 0.3%      |            |

**Calibration Drift Check**

| Final | Pre Cal   |                      | Post Cal             |             |
|-------|-----------|----------------------|----------------------|-------------|
|       | Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
|       | 0         | 0                    | -0.1                 | 0.3         |
|       | 9.3       | 9.3                  | 9.5                  | 0.6         |

Slope, M:  $M = \frac{C_{ma} - C_o}{C_m}$

$C_{ma}$  = Span Cal Gas Cyl. Value  
 $C_m$  = Calibration response  
 $C_o$  = Zero response

Predicted Response, PR:

$PR = M * C_{ma} + C_o$

Calibration Error Calculation, Cerr:

$C_{err} = \frac{C_m - PR}{C_{ma}} \times 100$

**APCC  
CEM CALIBRATION DATA  
EPA Method 25A**

|              |                   |                 |           |
|--------------|-------------------|-----------------|-----------|
| Project No.: | 16020             | Date:           | 26-Jul-16 |
| Plant/Firm:  | Baxter Healthcare | Analyzer:       | Vig 20/2  |
| Source:      | Oxidizer A        | Span Value:     | 300       |
| Location:    | Inlet             | Analyzer Range: | 1000      |
|              |                   | Cal Gas:        | methane   |

**PRE-TEST Calibration And Linearity:**

|                     | Zero | Low Range | Mid Range | High Range |  |
|---------------------|------|-----------|-----------|------------|--|
| Cal Gas Cyl. Value: | 0.0  | 85.7      | 175.0     | 290.8      |  |
| Cal Response:       | 0.0  | 85.8      | 177       | 290        |  |
| Slope:              |      | 0.9972    | 0.9972    | 0.9972     |  |
| Predicted Response: |      | 85.5      | 174.5     |            |  |
| Cal Error (<5%):    |      | 0.4%      | 1.4%      |            |  |

**Calibration Drift Check:**

**Run 1**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 0                    | 5.0                  | 1.7         |
| 85.7      | 85.8                 | 88.8                 | 1.0         |

**Run 2**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 5.0                  | 4.0                  | 0.3         |
| 85.7      | 88.8                 | 87.4                 | 0.5         |

**Run 3**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 4                    | 5.0                  | 0.3         |
| 85.7      | 87.4                 |                      | 29.1        |

**Emissions Averages:**

|                   | Run 1 | Run 2 | Run 3 | Average     |
|-------------------|-------|-------|-------|-------------|
| Analyzer Average: |       |       |       | #DIV/0! (C) |

Slope, M:  $M = \frac{C_{ma} - C_o}{C_m}$

$C_{ma}$  = Span Cal Gas Cyl. Value  
 $C_m$  = Calibration response  
 $C_o$  = Zero response

Predicted Response, PR:

$$PR = M * C_{ma} + C_o$$

Calibration Error Calculation, Cerr:

$$Cerr = \frac{C_m - Pr}{C_{ma}} \times 100$$

Calibration Drift Calculation, Cd:

$$Cd = \frac{\text{Pre Cal Response} - \text{Post Cal Response}}{\text{Span}}$$



**APCC  
CEM CALIBRATION DATA  
EPA Method 25A**

|              |                   |                 |           |
|--------------|-------------------|-----------------|-----------|
| Project No.: | 16020             | Date:           | 26-Jul-16 |
| Plant/Firm:  | Baxter Healthcare | Analyzer:       | Vig 200   |
| Source ID:   | Oxidizer A        | Span Value:     | 60        |
| Location:    | Outlet            | Analyzer Range: | 100       |
|              |                   | Cal Gas:        | methane   |

**PRE-TEST Calibration And Linearity:**

|                     | Zero | Low Range | Mid Range | High Range |
|---------------------|------|-----------|-----------|------------|
| Cal Gas Cyl. Value: | 0.0  | 19.2      | 31.1      | 56.8       |
| Cal Response:       | 0.0  | 19.1      | 31.2      | 56.8       |
| Slope:              |      | 1.0000    | 1.0000    | 1.0000     |
| Predicted Response: |      | 19.2      | 31.1      |            |
| Cal Error (<5%):    |      | -0.5%     | 0.3%      |            |

**Calibration Drift Check:**

**Run 1**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 0                    | 0.0                  | 0.0         |
| 19.2      | 19.1                 | 19.3                 | 0.3         |

**Run 2**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 0.0                  | 0.0                  | 0.0         |
| 19.2      | 19.3                 | 19                   | 0.5         |

**Run 3**

|           | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 0                    | 0.0                  | 0.0         |
| 19.2      | 19                   | 19.3                 | 0.5         |

**Emissions Averages:**

|                   | Run 1 | Run 2 | Run 3 | Average     |
|-------------------|-------|-------|-------|-------------|
| Analyzer Average: |       |       |       | #DIV/0! (C) |

Slope, M:  $M = \frac{C_{ma} - C_o}{C_m}$

$C_{ma}$  = Span Cal Gas Cyl. Value  
 $C_m$  = Calibration response  
 $C_o$  = Zero response

Predicted Response, PR:

$$PR = M * C_{ma} + C_o$$

Calibration Error Calculation, Cerr:

$$Cerr = \frac{C_m - PR}{C_{ma}} \times 100$$

Calibration Drift Calculation, Cd:

$$Cd = \frac{\text{Pre Cal Response} - \text{Post Cal Response}}{\text{Span}}$$

**APCC  
CEM CALIBRATION DATA  
EPA Method 25A**

Project No.: 16020  
Plant/Firm: Baxter Healthcare  
Source ID: Oxidizer A  
Location: Outlet

Date: 26-Jul-16  
Analyzer: Vig 200  
Span Value: 35  
Analyzer Range: 100  
Cal Gas: methane/propane

**PRE-TEST Calibration And Linearity:**

|                     | Zero | Low Range | Mid Range | High Range |  |
|---------------------|------|-----------|-----------|------------|--|
| Cal Gas Cyl. Value: | 0.0  | 9.3       | 15.2      | 30.1       |  |
| Cal Response:       | 0.2  | 9.4       | 15.6      | 30.6       |  |
| Slope:              |      | 1.0100    | 1.0100    | 1.0100     |  |
| Predicted Response: |      | 9.6       | 15.6      |            |  |
| Cal Error (<5%):    |      | -2.1%     | 0.3%      |            |  |

**Calibration Drift Check**

| Run 1     | Pre Cal              | Post Cal             |             |
|-----------|----------------------|----------------------|-------------|
| Gas Conc. | Calibration response | Calibration response | Drift (<3%) |
| 0         | 0.2                  | 0.0                  | 0.6         |
| 9.3       | 9.4                  | 9                    | 1.1         |

Slope, M:  $M = \frac{C_{ma} - C_o}{C_m}$

$C_{ma}$  = Span Cal Gas Cyl. Value  
 $C_m$  = Calibration response  
 $C_o$  = Zero response

Predicted Response, PR:

$$PR = M * C_{ma} + C_o$$

Calibration Error Calculation, Cerr:

$$Cerr = \frac{C_m - Pr}{C_{ma}} \times 100$$